

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RONNIE CANTY; JOHNNY COOK;)	
BETTY FAMBROUGH; REGINALD)	
CONQUEST, JR.; JAPRONICA)	
FAMBROUGH, as natural guardian)	CIVIL ACTION
of AKEMI A. FAMBROUGH-)	FILE NO. _____
HOLLOWAY; TYANCA FAMBROUGH,)	[On removal from the State
individually and as parent and natural)	Court of DeKalb County,
guardian of JUSTIN GARDNER;)	Georgia, Civil Action
TERRELL FAMBROUGH; TIAMIYA)	File No. 23A00618.]
FAMBROUGH; TYLA FAMBROUGH,)	
Individually and as parent and natural)	
Guardian of ANDONIS FAMBROUGH;)	
)
)
Plaintiffs,)	
)
v.)	
)
TODD DANIELS; DIMENSIONALL)	
TRANSPORTATION, LLC; AMERICAN)	
ZURICH INSURANCE COMPANY;)	
JOHN DOE 1-2; ABC CORP.; XYZ)	
CORP.;)	
)
Defendants.)	
)

CERTIFICATE OF REMOVAL

I hereby certify that I am counsel for Defendant ZURICH AMERICAN INSURANCE COMPANY, improperly named herein as "American Zurich

Insurance Company" ("Zurich"), in the above-styled proceeding and this day have filed a copy of the "Notice of Removal," including "Notice of Filing Notice of Removal," in the State Court of DeKalb County, Georgia, the court from which said action was removed.

Respectfully submitted this 13th day of March, 2023.

**SWIFT, CURRIE, McGHEE & HIERS,
LLP**

/s/ M. Brandon Howard

Stephen M. Schatz
Georgia Bar No. 628840
M. Brandon Howard
Georgia Bar No. 550524
**Attorneys for Zurich American Insurance
Company (improperly named as American
Zurich Insurance Company)**

1420 Peachtree St., N.E., Suite 800
Atlanta, GA 30309
Tel: (404) 874-8800
Fax: (404) 888-6199
steve.schatz@swiftcurrie.com
brandon.howard@swiftcurrie.com

LOCAL RULE 5.1C CERTIFICATION

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1C.

Respectfully submitted this 13th day of March, 2023.

**SWIFT, CURRIE, McGHEE & HIERS,
LLP**

/s/ M. Brandon Howard
Stephen M. Schatz
Georgia Bar No. 628840
M. Brandon Howard
Georgia Bar No. 550524
**Attorneys for Zurich American Insurance
Company (improperly named as American
Zurich Insurance Company)**

1420 Peachtree St., N.E., Suite 800
Atlanta, GA 30309
Tel: (404) 874-8800
Fax: (404) 888-6199
steve.schatz@swifcurrie.com
brandon.howard@swifcurrie.com

CERTIFICATE OF SERVICE

This is to certify that this day I have electronically filed this *Certificate of Removal* with the Clerk of Court by e-filing same using the CM/ECF System, which will automatically send e-mail notification of said filing to the following attorneys of record:

Robert L. Poston, Esq.
The Angell Law Firm, LLC
3391 Peachtree Road, NE
Suite 110
Atlanta, Georgia 30326
ecf@atlantalaawyer.com
Attorney for Plaintiffs

Respectfully submitted this 13th day of March, 2023.

**SWIFT, CURRIE, McGHEE & HIERS,
LLP**

/s/ M. Brandon Howard
Stephen M. Schatz
Georgia Bar No. 628840
M. Brandon Howard
Georgia Bar No. 550524
*Attorneys for Zurich American Insurance
Company (improperly named as American
Zurich Insurance Company)*

1420 Peachtree St., N.E., Suite 800
Atlanta, GA 30309
Tel: (404) 874-8800
Fax: (404) 888-6199
steve.schatz@swiftcurrie.com
brandon.howard@swiftcurrie.com